## REMARKS

*Election/Restrictions*

Applicants hereby confirm the election of claims 1-33 and 40-41 for prosecution without traverse. Claims 34-39 have been canceled without prejudice to Applicants' right to pursue claims that are the same as or similar to claims 34-39 in a divisional application.

*Claim Rejections*

*Section 102 Rejections*

In the Office Action, claims 1-22, 26-30, 32, 40 and 41 were rejected as being anticipated by U.S. Pat. 5,164,827 to Paff. Paff, however, does not anticipate these claims because Paff does not show each and every element of the claims. *See* MPEP §2131 ("A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."). Specifically, Paff does not show a system that computes parameters such that the *size of the target is substantially the same in the images from the different cameras*, as recited in independent claims 1, 10, 19, 28 and 40.

Paff is directed to a camera surveillance system. Multiple camera views of a subject are obtained in the Paff system, and the video from each of the cameras is displayed on a separate monitor. *See* Paff, col. 5: 8-10. The operator is therefore provided with multiple views of the subject from different viewpoints. *Id.* at col. 5: 11-12. Thus, the Paff system is not concerned with making a visual special effect, as in the present invention. Since it is merely a surveillance system, there is no need or teaching in the Paff system to keep the size of the target in the images substantially the same size.

In Paff, the controller calculates the coordinates of the target based on the pan and tilt values of the master camera (and the known height of the master camera). *See* Paff, col. 4: 42-48. The calculated coordinates are then broadcast to all of the slave cameras. *Id.* at col. 4: 48-49. Based on the received coordinates, the controllers of the slave cameras determine the pan and tilt values for the slave cameras "to bring the optical axis 17A of the image and lens assembly of the slave camera to the selected position." *Id.* at col. 4: 62 to col. 5: 2. There is no mention of determining the zoom and focus parameters of the slave cameras in Paff such that the size of the target is substantially the same in the images from the different cameras.

As an additional embodiment, Paff does teach that the master camera can broadcast information relating to the zoom status and focus of the master camera. *See* Paff, col. 7: 68 to col. 8: 2. According to Paff:

> The slave cameras SD1-SD5 responsive to this information can then adjust their own zooming states or conditions so that the subject is at approximately the same magnification as with the master camera. In this manner, if the zooming state of the master camera is set to wide angle so that a large group of subjects can be tracked though the premises, the slave cameras will also be set to a wide angle position. Conversely, if the zooming state of the master camera is set tight so as to track a single individual through the premises, the slave cameras similarly will have a tight zoom setting. Still further, the master camera can broadcast information regarding its focus state to the slave cameras.

Paff, col. 8: 2-15.

Although this passage teaches broadcasting the zoom or focus parameters of the master camera, there is no mention or contemplation of calculating the focus and zoom parameters of the slave cameras that leads to having the target be substantially the same size in the images from the different cameras, as in the claims of the present application. Rather, Paff merely suggests that all of the cameras may be set to the same magnification. This does not necessarily mean --

indeed it is highly unlikely -- that the size of the target will be same in the images from all of the cameras.

For at least this reason, claims 1-22, 26-30, 32, 40 and 41 are not anticipated by Paff.

In addition, although not necessary, Applicants wish to point out that Paff lacks several other elements recited in the claims rejected under §102. As one example, Paff fails to teach or suggest a video sequence generator that generates a video image sequence of the target by outputting an image from certain of the cameras in sequence according to their position around the scene, as recited in claims 6, 15, 23 and 31.

*Section 103 Rejections*

In the Office Action, claims 23-25, 31 and 33 were rejected as being obvious under 35 U.S.C. §103(a) over Paff in view of published U.S. patent application Pub. No. 2001/0052131 to Hobson et al. The §103 rejection of these dependent claims, however, was predicated on the §102 rejection of the independent claims based on Paff. As discussed above, Paff does not anticipate the independent claims. Accordingly, the §103 rejections should be withdrawn.

*Claim Amendment*

Although not rejected, claims 31-33 have been amended to correct clerical errors.

*New Claims*

New claims 42-45 have been added. Support for the new claims may be found throughout the application as filed, including paragraphs [0024].

*Information Disclosure Statement*

Applicants note that a supplemental information disclosure statement (IDS) for this application was filed on January 26, 2005. The references cited in the IDS should be considered by the Office in determining the patentability of the claims of the present application.

*Conclusion*

In view of the above, Applicants respectfully request withdrawal of the rejections and allowance of the claims. If the Examiner is of the opinion that the instant application is in condition for disposition other than allowance, the Examiner is respectfully requested to the undersigned attorney at the telephone number listed below in order that the Examiner's concerns may be expeditiously addressed.

Respectfully submitted,

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